

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 24-CR-36

v.

JOSEPH D. CHARLESWORTH,

Defendant.

MOTION FOR ENTRY OF PRELIMINARY ORDER OF FORFEITURE

The United States of America, by its attorneys, Gregory J. Haanstad, United States Attorney for the Eastern District of Wisconsin, and Timothy W. Funnell, Assistant United States Attorney for said District, hereby moves this Court pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure for an order forfeiting to the United States all right, title and interest in the following properties described in the forfeiture notice of the Superseding Indictment filed March 5, 2024:

1. a Canik 9-mm pistol, serial number 23CT31050; and
2. approximately 265 rounds of 9-millimeter ammunition.

This motion is based on the provisions of Title 18, United States Code, Section 924(d); Title 28, United States Code, Section 2461(c); and on all proceedings of record in this case. In particular, defendant Joseph D. Charlesworth pled guilty to Counts Four and Six of the Superseding Indictment and pursuant to his plea agreement, agreed to the forfeiture of the properties listed in the Superseding Indictment.

No affidavit or memorandum is submitted in support of this motion.

Dated at Green Bay, Wisconsin, this 24th day of June, 2024.

GREGORY J. HAANSTAD
United States Attorney

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